

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Rural Call Completion	)	WC Docket No. 13-39
	)	

**REPLY COMMENTS OF THE  
ALARM INDUSTRY COMMUNICATIONS COMMITTEE**

The Alarm Industry Communications Committee (“AICC”), on behalf of its members,<sup>1</sup> hereby files reply comments on the Commission's *Third Further Notice of Proposed Rulemaking*<sup>2</sup> concerning the implementation of Rural Call Completion Act (“RCC Act”), which requires the Commission to establish registration requirements and service quality standards for intermediate providers. The comments demonstrate that the Commission should adopt the proposed registration, general call quality, and monitoring requirements. In addition, AICC urges the Commission to require adherence to certain Managed Facilities-Based Voice Network (“MFVN”) standards for intermediate call providers. The Commission should not, however,

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<sup>1</sup> The Monitoring Association (TMA) (formerly known as Central Station Alarm Association), Electronic Security Association (ESA), Security Industry Association (SIA), the National Public Safety Telecommunications Council, Ackerman Security, ADS, ADT, AES- IntelliNet, AFA Protective Systems, Alarm.com, Alarm Detection Systems, ASG Security, Axis Communications, Bay Alarm, Bosch Security Systems, COPS Monitoring, CRN Wireless, LLC, DGA Security, Digital Monitoring Products, Digital Security Control, Encore Networks, FM Approvals, Honeywell Security, Inovonics, Interlogix, Intertek Testing, iPDatatel, Napco Security, NetOne, Inc., Nortek, Protection One, Rapid Response Monitoring, Security Central NC, Select Security/Security Partners, Stanley Security, Supreme Security Systems, Inc., Telular Corp., Tyco Integrated Security, Tyco Security Products, Underwriters Laboratories, Universal Atlantic Systems, Vector Security, Inc., Vivint, and Wayne Alarm.

<sup>2</sup> *Rural Call Completion*, Third Notice of Proposed Rulemaking, WC Docket No. 13-39, FCC 18-45 (rel. Apr. 17, 2018) (*NPRM*).

eliminate the requirement on covered providers to record and retain records on call completion rates, at least until it can be determined that the new rules have improved the situation.

AICC applauds the Commission's efforts in addressing the issues associated with rural call completion. AICC member companies protect over 30 million residential, business and sensitive facilities and their occupants from fire, burglaries, sabotage and other emergencies and, consequently, are an integral part of the public safety network. The ability to promptly and accurately respond to an emergency can mean the difference between life and death for those protected by this industry, and the possibility that emergency calls may not be delivered is an issue that requires a 100% solution.

**I. The Commission Should Adopt Standards for Intermediate Providers**

AICC supports the imposition of general call quality requirements as proposed by the Commission, in conjunction with self-monitoring requirements for intermediate providers. As NTCA notes that “[t]hese sorts of industry-developed standards represent the minimal level of quality that every consumer should be able to expect when placing or receiving a voice call and the burden is no more than one would expect of someone contracted to complete a call,”<sup>3</sup> and Inteliquent states that it follows these requirements today “and agrees that they facilitate call completion.”<sup>4</sup> Inteliquent further notes that “requiring intermediate providers to adhere to industry best practices, coupled with self-monitoring, will reduce problems in the call path and will enable providers to more quickly remedy problems when they do arise.”<sup>5</sup>

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<sup>3</sup> Comments of NTCA-The Rural Broadband Association, WC Docket No. 13-39, filed June 4, 2018 at pp. 3-4.

<sup>4</sup> Comments of Inteliquent, WC Docket No. 13-39, filed June 4, 2018 at pp. 2-3.

<sup>5</sup> Comments of NTCA at p. 4.

In addition, AICC believes that the Commission should require intermediate providers to adhere to the MFVN standard (except for line seizure, which is an installation function at the originating premises). As AICC has often discussed in the context of technology transitions, the alarm industry has encountered problems because service providers used “least cost routers” or intermediary carriers without understanding or monitoring the impact those intermediary carriers would have on the performance of the network.<sup>6</sup> If intermediate providers’ services are not equivalent to the original carrier’s service with respect to dialing, dial plan, call completion, carriage of signals and protocols, loop voltage treatment, decibel loss, jitter, dual tone multi frequency (DTMF) signal performance, compression and latency, alarm transmission may be degraded or completely undelivered.<sup>7</sup> The MFVN standard, as described by AT&T, means:

[A] physical facilities network that (a) is managed and maintained (directly or indirectly) by the service provider to ensure service quality and reliability from the service subscriber location to the Public Switched Telephone Network (“PSTN”) or other MFVN peer network; (b) utilizes similar signaling and related protocols as the PSTN with respect to dialing, dial plan, call completion, and the carriage of alarm signals and protocols, loop voltage treatment (in accordance with FCC Part 68/TIA-968A); and (c) provides real- time transmission of voice signals, carrying alarm formats unchanged.<sup>8</sup>

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<sup>6</sup> See, e.g., Comments of AICC, WC Docket No. 13-5, filed November 24, 2015.

<sup>7</sup> See, e.g., Comments of AICC, WC Docket No. 18-74, filed June 15, 2017.

<sup>8</sup> Letter from Frank Simone, Vice President of Regulatory Affairs, AT&T, to Marlene H. Dortch, Secretary, FCC, PS Docket 14-174, GN Docket 13-5, RM-11358 (filed June 8, 2015), Exhibit A, IP Transition and Alarm Monitoring Services Principles.

Requiring intermediate providers to meet the MFVN standards would greatly reduce alarm signaling failures the alarm industry has encountered due to various technology types.<sup>9</sup>

## **II. The Commission Should Adopt Registration Requirements**

AICC agrees with those commenters who support the requirement for intermediate providers to register at the Commission and in particular, provide a contact person. NTCA states that registration is a “great benefit by helping operators and the Commission itself identify and correct call completion issues,”<sup>10</sup> and ATIS indicates that registration will “help with traceback efforts should call termination issues arise.”<sup>11</sup> Inteliquent argues that registration “discourages bad network practices in the first instance, and it affords other carriers in the call path a better understanding of whether an intermediate provider is reliable.”<sup>12</sup> The record clearly demonstrates the usefulness of registration and the availability of a contact person in combating rural call completion issues.

AICC also supports the removal of intermediate providers from the register if they have poor call completion. On this score, AICC further agrees with NTCA that Congress’ intention in enacting the RCC Act was to prohibit reliance on *any* unregistered intermediate provider, and that limiting the prohibition to only the first in a potential chain “would enable unscrupulous carriers or intermediate providers to circumvent their ultimate responsibility to complete calls,” and generally run counter to Congress’ intent in adopting the RCC Act. AICC also supports ATIS’ contention that “the Commission should have a clear and conclusive pattern of non-compliance and that before being able to

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<sup>9</sup> See, e.g., Comments of AICC, WC Docket No. 17-84, at 8 (filed June 15, 2017) (describing failures due to compression of a VoIP signal below accepted specifications); Reply Comments of the Alarm Industry Communications Committee, WC Docket No. 17-84 at 6 (filed July 17, 2017) (noting serious issues in 2016 and 2017 when alarm signals have not been completed in connection with Verizon’s fiber facilities).

<sup>10</sup> Comments of NTCA at p. 2.

<sup>11</sup> Comments of ATIS, WC Docket No. 13-39, filed June 4, 2018 at p. 3.

<sup>12</sup> Comments of Inteliquent at p. 5.

re-register, such intermediate carriers should be required to clearly indicate to the Commission that they have fixed any problems.”<sup>13</sup>

### **III. The Commission Should Not Eliminate Recordkeeping and Retention**

Despite the number of positive steps taken so far, AICC believes that the Commission’s recording and retention rules should not be sunset until it is clear that real improvements are being achieved. In this regard, AICC supports the comments of NTCA, which correctly point out, “[t]here is nothing in the current rules that holds carriers or intermediate providers to a specific rural call completion percentage threshold. Without record keeping, there is no way to measure or enforce the language of the RCC Act that is intended to ‘prevent unjust or unreasonable discrimination among areas of the United States. . .’”<sup>14</sup>

As the Commission recognized in the introduction to the *FNPRM* itself, rural call completion has remained an issue despite the Commission’s not-insubstantial efforts to address the problem since 2011.<sup>15</sup> While AICC shares the Commission’s hope that, “the implementation of the RCC Act should allow the Commission to more efficiently address rural call completion issues,”<sup>16</sup> AICC respectfully agrees with NTCA’s assertion that “determine first if elimination of the reporting requirements has had any impact upon call completion, and also provide time for implementation and evaluation of the intermediate provider rules to be adopted in this

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<sup>13</sup> Comments of ATIS at p. 5.

<sup>14</sup> Comments of NTCA at p. 6.

<sup>15</sup> *NPRM* at ¶5-9.

<sup>16</sup> *NPRM* at ¶109.

proceeding before reaching any conclusions with respect to whether the recordkeeping and retention requirements should likewise be torn down.”<sup>17</sup>

#### **IV. Conclusion**

In light of the forgoing, the Commission should adopt the proposed registration, general call quality, and monitoring requirements. In addition, the Commission should also require intermediate providers to adhere to MFVN standards, except the requirement for line seizure. This would not only address many of AICC’s with call completion, but also with alternative carriers (as discussed in the *Wireline Deployment* docket). The Commission should not, however, eliminate the requirement on covered providers to record and retain records on call completion rates, at least until it can be determined that the new rules have improved the situation.

Respectfully submitted,

**ALARM INDUSTRY COMMUNICATIONS  
COMMITTEE**

A handwritten signature in black ink that reads "Louis T. Fiore". The signature is written in a cursive, flowing style.

Louis T. Fiore

Chairman  
Alarm Industry Communications Committee  
8150 Leesburg Pike – Suite 700  
Vienna, VA 22182

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<sup>17</sup> Comments of NTCA at p. 7.